

FILED

APR 10 2013

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. S1-4:12CR00332 JAR
)	
MAGGIE HAIRSTON,)	
)	
Defendant.)	

SUPERSEDING INDICTMENT

COUNT ONE

The Grand Jury charges:

On or about December 30, 2010, in the Eastern District of Missouri, the defendant,

MAGGIE HAIRSTON,

in a matter within the jurisdiction of the Social Security Administration, an agency of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on Form SSA-623-OCR-SM, entitled "Representative Payee Report," did state and represent and cause to be stated and represented that she spent \$8,088.00 for food, housing, clothing, education, medical and dental expense, recreation, and personal items for T.B between December 1, 2009 and November 30, 2010 when in truth and in fact, as **MAGGIE HAIRSTON**, then well knew, T.B. did not live with her after December 10, 2008 and she did not spend \$8,088.00 for the benefit of T.B. between December 1, 2009 and November 30, 2010.

In violation of Title 18, United States Code, Section 1001.

COUNT TWO

The Grand Jury further charges:

On or about September 30, 2011, in the Eastern District of Missouri, the defendant,

MAGGIE HAIRSTON,

in a matter within the jurisdiction of the Social Security Administration, an agency of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on the form entitled "Statement of Claimant or Other Person," did state and represent and cause to be stated and represented that she has never lived with her husband since 1988, she lives alone, she only owned the residence in which she lived, she owned one vehicle which was a 1992 Buick Roadmaster, and she had a single financial account at Anheuser Busch Credit Union when in truth and in fact, as **MAGGIE HAIRSTON**, then well knew she was listed with the City of St. Louis, Missouri as the sole and joint owner of multiple properties, owned more than one vehicle, and had a joint bank account with her husband.

In violation of Title 18, United States Code, Section 1001.

COUNT THREE

The Grand Jury further charges that:

On or about July 1, 2011, in the Eastern District of Missouri, the defendant,

MAGGIE HAIRSTON,

did willfully and knowingly steal, purloin, and convert to her use, and the use of another, money of the United States, that is, funds of the Social Security Administration, that being Supplemental Security Income disability benefits in the amount of \$674.00.

In violation of Title 18, United States Code, Section 641.

COUNT FOUR

The Grand Jury further charges that:

On or about August 1, 2011, in the Eastern District of Missouri, the defendant,

MAGGIE HAIRSTON,

did willfully and knowingly steal, purloin, and convert to her use, and the use of another, money of the United States, that is, funds of the Social Security Administration, that being Supplemental Security Income disability benefits in the amount of \$674.00.

In violation of Title 18, United States Code, Section 641.

COUNT FIVE

The Grand Jury further charges that:

On or about November 1, 2011, in the Eastern District of Missouri, the defendant,

MAGGIE HAIRSTON,

did willfully and knowingly steal, purloin, and convert to her use, and the use of another, money of the United States, that is, funds of the Social Security Administration, that being Supplemental Security Income disability benefits in the amount of \$674.00.

In violation of Title 18, United States Code, Section 641.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

TRACY L. BERRY, 014753 TN
Assistant United States Attorney